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PAGE 1 of 6
CIRCUIT COURT OF
COOK COUNTY-ILLINOIS
LAW DIVISION
CLERK DOROTHY BROWN

OF ILLINOIS)
)
TY OF COOK)

IN THE CIRCUIT COURT COOK COUNTY, ILLINOIS

SUMRANA SYEDA AHMED)

Plaintiff)

vs.)

No.: _____

LINDA SOLBERG LOSEN, SANOFI-)
AVENTIS, SANOFI U.S.SERVICES INC.,)
SANOFI-AVENTIS U.S. INC., SANOFI-)
AVENTIS U.S. LLC, D.L. PETERSON)
TRUST, ELEMENT VEHICLE)
MANAGEMENT SERVICES, LLC and)
ELEMENT VEHICLE MANAGEMENT)
SERVICES GROUP, LLC)

Defendants.)

COMPLAINT AT LAW

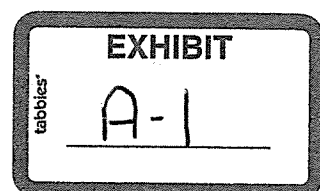
COUNT I

NEGLIGENCE

(Sumrana Syeda Ahmed vs. Linda Sloberg Losen)

NOW COMES the Plaintiff, Sumrana Syeda Ahmed, by her Attorneys, SALVI & MAHER,
LLC and complaining of the Defendant, Linda Solberg Losen, states as follows:

1. That on July 16, 2014, Barrington Road was a public roadway generally extending in an
northerly and southerly direction, in Inverness, Cook County, Illinois.
2. That on July 16, 2014, Palatine Road, was a public roadway generally extending in an westerly and
easterly direction, in Inverness, Cook County, Illinois.



3. That on July 16, 2014, Defendant, Linda Solberg Losen, operated a certain motor vehicle in a northerly direction at or near the intersection of Barrington Road and Palatine Road, in Inverness, Cook County, Illinois.
4. That on July 16, 2014, Plaintiff, Sumrana Syeda Ahmed, operated a certain motor vehicle in a northerly direction at or near the intersection of Barrington Road and Palatine Road, Inverness, Cook County, Illinois.
5. That on July 16, 2014, a collision occurred between the motor vehicle operated by Defendant, Linda Solberg Losen, and the motor vehicle operated by Plaintiff, Sumrana Syeda Ahmed.
6. That on July 16, 2014, said collision occurred at or near the intersection of Barrington Road and Palatine Road, Inverness, Cook County, Illinois.
7. That on July 16, 2014, the Defendant, Linda Solberg Losen, owed a duty to the Plaintiff, Sumrana Syeda Ahmed, to exercise reasonable care in the operation of her motor vehicle.
8. That on July 16, 2014, the Defendant, Linda Solberg Losen, breached that duty and was negligent in one or more of the following respects:
 - a. Drove her vehicle at a speed which was greater than was reasonable and proper with regard to traffic conditions and the use of the roadway in violation of 625 ILCS 5/11-601;
 - b. Failed to keep a proper and sufficient lookout for vehicles upon the roadway;
 - c. Failed to reduce the speed of her vehicle to avoid colliding with the vehicle being operated by the Plaintiff, in violation of 625 ILCS 5/11-601;
 - d. Failed to sound the horn on said vehicle so as to give warning of its approach, in violation of 625 ILCS 5/12-601.
 - e. Failed to maintain control and direction over the operation of her motor vehicle so as to cause said vehicle to collide with the vehicle occupied by Plaintiff;
 - f. Failed to operate a vehicle equipped with brakes adequate to control the movement of and to stop and hold her vehicle, in violation of 625 ILCS 5/12-301;
9. That as a proximate result of one or more of the forgoing negligent acts/or omissions by the

Defendant, Linda Solberg Losen, the Plaintiff, Sumrana Syeda Ahmed, was and became bodily injured, both internally and externally; suffered and will in the future suffer pain, disability, and loss of a normal life; has and will become obligated for large sums of money for medical care; and has suffered and will in the future suffer lost income.

WHEREFORE, Plaintiff, Sumrana Syeda Ahmed, demands judgment against Defendant, Linda Solberg Losen, in an amount in excess of \$ 50,000.00.

COUNT II
NEGLIGENCE

(Sumrana Syeda Ahmed v Sanofi-Aventis, Sanofi U.S., Services, Inc., Sanofi-Aventis U.S. Inc.,
Sanofi-Aventis U.S. LLC)

NOW COMES the Plaintiff, Sumrana Syeda Ahmed, by her Attorneys, SALVI & MAHER, LLC and complaining of the Defendant, Sanofi-Aventis, Sanofi U.S., Services, Inc., Sanofi-Aventis U.S. Inc., Sanofi-Aventis U.S. LLC., (hereinafter referred to as Sanofi-Aventis) states as follows:

1. That on July 16, 2014, Barrington Road was a public roadway generally extending in an northerly and southerly direction, in Inverness, Cook County, Illinois.
2. That on July 16, 2014, Palatine Road, was a public roadway generally extending in an westerly and easterly direction, in Inverness, Cook County, Illinois.
3. That on July 16, 2014, Defendant, Linda Solberg Losen, operated a certain motor vehicle in a northerly direction at or near the intersection of Barrington Road and Palatine Road, in Inverness, Cook County, Illinois.
4. That on July 16, 2014, Plaintiff, Sumrana Syeda Ahmed, operated a certain motor vehicle in a northerly direction at or near the intersection of Barrington Road and Palatine Road, Inverness, Cook County, Illinois.

5. That on July 16, 2014, a collision occurred between the motor vehicle operated by Defendant, Linda Solberg Losen, and the motor vehicle operated by Plaintiff, Sumrana Syeda Ahmed.
6. That on July 16, 2014, said collision occurred at or near the intersection of Barrington Road and Palatine Road, Inverness, Cook County, Illinois.
7. That on July 16, 2014 and at all times relevant hereto, the Defendant Linda Solberg Losen was acting in the course and scope of her duties as an employee, servant, and/or agent of Defendant Sanofi-Aventis.
8. That on July 16, 2014, the Defendant, Linda Solberg Losen, owed a duty to the Plaintiff, Sumrana Syeda Ahmed, to exercise reasonable care in the operation of her motor vehicle.
9. That on July 16, 2014, the Defendant, Linda Solberg Losen, breached that duty and was negligent in one or more of the following respects:
 - a. Drove her vehicle at a speed which was greater than was reasonable and proper with regard to traffic conditions and the use of the roadway in violation of 625 ILCS 5/11-601;
 - b. Failed to keep a proper and sufficient lookout for vehicles upon the roadway;
 - c. Failed to reduce the speed of her vehicle to avoid colliding with the vehicle being operated by the Plaintiff, in violation of 625 ILCS 5/11-601;
 - d. Failed to sound the horn on said vehicle so as to give warning of its approach, in violation of 625 ILCS 5/12-601.
 - e. Failed to maintain control and direction over the operation of her motor vehicle so as to cause said vehicle to collide with the vehicle occupied by Plaintiff;
 - f. Failed to operate a vehicle equipped with brakes adequate to control the movement of and to stop and hold her vehicle, in violation of 625 ILCS 5/12-301;
10. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions by the Defendant, Sanofi-Aventis., the Plaintiff, Sumrana Syeda Ahmed, sustained severe and permanent injuries, both externally and internally; suffered and will in the future suffer pain, disability, and the loss of a normal life; has become and will in the future become obligated for large sums of money for medical care; and has lost money that would have otherwise been earned.

WHEREFORE, the Plaintiff, Sumrana Syeda Ahmed, demands judgement against the Defendants, Sanofi-Aventis, Sanofi U.S., Services, Inc., Sanofi-Aventis U.S. Inc., Sanofi-Aventis U.S. LLC., in excess of the minimum jurisdictional limit of the law division of the Circuit Court of Cook County.

COUNT III
NEGLIGENCE

(Sumrana Syeda Ahmed v D.L. Peterson Trust, Element Vehicle Management Services, LLC and Element Vehicle Management Services Group, LLC)

NOW COMES the Plaintiff, Sumrana Syeda Ahmed, by her Attorneys, SALVI & MAHER, LLC and complaining of the Defendant, D.L. Peterson Trust, Element Vehicle Management Services, LLC and Element Vehicle Management Services Group, LLC states as follows:

1-6. The Plaintiff, Sumrana Syeda Ahmed, restates and incorporates paragraphs 1 through 6 of Count II of this Complaint as and for paragraphs 1 through 6 of Count III of this Complaint.

7. That on July 16, 2014 and at all times relevant hereto, the Defendant Linda Solberg Losen was acting in the course and scope of her duties as an employee, servant, and/or agent of Defendant D.L.

Peterson Trust, Element Vehicle Management Services, LLC and Element Vehicle Management Services Group, LLC

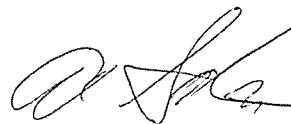
8. That on July 16, 2014, the Defendant, Linda Solberg Losen, owed a duty to the Plaintiff, Sumrana Syeda Ahmed, to exercise reasonable care in the operation of her motor vehicle.

9. That on July 16, 2014, the Defendant, Linda Solberg Losen, breached that duty and was negligent in one or more of the following respects:

- a. Drove her vehicle at a speed which was greater than was reasonable and proper with regard to traffic conditions and the use of the roadway in violation of 625 ILCS 5/11-601;
- b. Failed to keep a proper and sufficient lookout for vehicles upon the roadway;
- c. Failed to reduce the speed of her vehicle to avoid colliding with the vehicle being operated by the Plaintiff, in violation of 625 ILCS 5/11-601;
- d. Failed to sound the horn on said vehicle so as to give warning of its

- approach, in violation of 625 ILCS 5/12-601.
- e. Failed to maintain control and direction over the operation of her motor vehicle so as to cause said vehicle to collide with the vehicle occupied by Plaintiff;
 - f. Failed to operate a vehicle equipped with brakes adequate to control the movement of and to stop and hold her vehicle, in violation of 625 ILCS 5/12-301;
10. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions by the Defendant, D.L. Peterson Trust, Element Vehicle Management Services, LLC and Element Vehicle Management Services Group, LLC, the Plaintiff, Sumrana Syeda Ahmed, sustained severe and permanent injuries, both externally and internally; suffered and will in the future suffer pain, disability, and the loss of a normal life; has become and will in the future become obligated for large sums of money for medical care; and has lost money that would have otherwise been earned.

WHEREFORE, the Plaintiff, Sumrana Syeda Ahmed, demands judgement against the Defendants, D.L. Peterson Trust, Element Vehicle Management Services, LLC and Element Vehicle Management Services Group, LLC, in excess of the minimum jurisdictional limit of the law division of the Circuit Court of Cook County.



Attorney for Plaintiff

Albert J. Salvi (ARDC# 6191178)
SALVI & MAHER, LLC
325 Washington Street - Suite 302
Waukegan, Illinois 60085
Attorney Firm Number 28837
Tel: (847) 662-3303
Fax: (847) 662-3453
Firm No. 28837

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PAGE 1 of 1
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LAW DIVISION
CLERK DOROTHY BROWN

STATE OF ILLINOIS)
)
COUNTY OF COOK)

IN THE CIRCUIT COURT COOK COUNTY, ILLINOIS

SUMRANA SYEDA AHMED)

Plaintiff)

vs.)

No.: _____

LINDA SOLBERG LOSEN, SANOFI-)
AVENTIS, SANOFI U.S.SERVICES INC.,)
SANOFI-AVENTIS U.S. INC., SANOFI-)
AVENTIS U.S. LLC, D.L. PETERSON)
TRUST, ELEMENT VEHICLE)
MANAGEMENT SERVICES, LLC and)
ELEMENT VEHICLE MANAGEMENT)
SERVICES GROUP, LLC)

Defendants.)

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(B)

Pursuant to Supreme Court Rule 222(B), counsel for the above-named plaintiff certifies that plaintiff seeks money damages in excess of Fifty-thousand and 00/100ths Dollars (\$50,000.00).

By:

Attorney for Plaintiff